

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MAR 20 2024
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No.
RONNIE MOTTLEY,)
Defendant.)

4:24cr133-SRC/PLC

MOTION FOR PRETRIAL DETENTION AND HEARING

The United States of America, by and through its Attorneys, Sayler Fleming, United States Attorney for the Eastern District of Missouri, and Nichole E. Frankenberg, Assistant United States Attorney for the District, moves the Court to order Defendant detained pending trial and further requests that a detention hearing be held three days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is currently charged with one count of being a Felon in Possession of a Firearm, in violation of Title 18, United States Code, Section 922(g)(1), two counts of Assault on Federal Officers, in violation of Title 18, United States Code, Section 111(a)(1), two counts of Brandishing of a Firearm in Furtherance of Crime of Violence, in violation of Title 18, United States Code, Section 924(c), and Possession with Intent to Distribute Fentanyl, in violation of Title 21, United States Code, Section 841(a)(1).

2. Because Defendant has been charged with violations of Title 18, United States Code, Section 924(c) a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person

and the community.

The Nature and Circumstances of the Offense

3. Pursuant to Title 18, United States Code, Section 3142(g)(1), the nature and circumstances of the charged offenses warrant pre-trial detention. On May 30, 2023, Task Force Officers initiated a lawful traffic stop of a blue Jaguar. The vehicle fled the stop, driving recklessly through a residential neighborhood. Tire deflation devices were deployed and ultimately the vehicle crashed. Through the door of the crashed vehicle the Defendant brandished a handgun at TFO Meadows, TFO Keener, and TFO Davis before fleeing on foot. As the foot pursuit ensued, officers observed the firearm still in the Defendant's hand. TFO Bradley caught up to the Defendant, who immediately pointed a firearm at TFO Bradley. TFO Bradley, in response, discharged his firearm in the direction of Defendant multiple times. The Defendant was not injured in the shooting. Defendant threw his firearm and a large bag of what was later determined to be narcotics. Defendant was taken into custody soon thereafter. As the Defendant was being taken into custody, he attempted to swallow two bags of suspected narcotics.

The firearm and narcotics were both located nearby. In the defendant's vehicle were narcotics, a digital scale, a loaded Glock magazine, and an open box of sandwich baggies.

Laboratory analysis determined the narcotics found on the defendant at the time of his arrest to be cocaine base; the narcotics thrown by the defendant to be 70.986 grams of fentanyl; and, the narcotics found in the defendant's vehicle to be fentanyl (152 pills weighing approximately 2.128 grams).

Further, laboratory analysis confirmed the presence of defendant's DNA on the grip of the recovered firearm and on the bag of fentanyl that had been throw by the defendant.

The Weight of the Evidence

4. Pursuant to Title 18, United States Code, Section 3142(g)(2), the weight of the

evidence supports pre-trial detention. DNA evidence links the defendant to the possession of the firearm and the narcotics. Further, four Task Force Officers identify Defendant as having pointed a firearm at them.

Defendant's History and Characteristics

5. Pursuant to Title 18, United States Code, Section 3142(g)(3), Defendant's criminal history weighs in favor of detention. Defendant has prior convictions for Murder in the Second Degree and Armed Criminal Action (2014), and for Trafficking in Drugs in the Second degree (2012).

Danger to the Community

6. Pursuant to Title 18, United States Code, Section 3142(g)(4), Defendant should be detained pending trial, due to the danger he poses to the community. Given his prior convictions, and the nature and circumstances of the present offenses, no alternative set of restrictions will be sufficient to protect the public.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/ Nichole E. Frankenberg
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